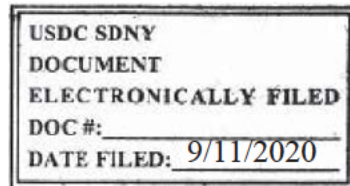


EPSTEIN SACKS PLLC
ATTORNEYS AT LAW
100 LAFAYETTE STREET
SUITE 502
NEW YORK, N.Y. 10013
(212) 684-1230



BENNETT M. EPSTEIN: (917) 653-7116
SARAH M. SACKS: (917) 566-6196

September 11, 2020

Hon. Alison J. Nathan
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Filed on ECF

Re: *United States v. Alejandro Paulino*
19 Cr. 607 (AJN)

Dear Judge Nathan:

We represent the defendant Alejandro Paulino under the Criminal Justice Act. We write to ask the Court to modify Mr. Paulino's bail conditions so that he can accept a job offer in Stamford, Connecticut. Under his current bail conditions, his travel is limited to the Southern and Eastern Districts of New York. As we explained in our September 4, 2020 letter to the Court (Dkt. #68), Mr. Paulino had jobs at two different restaurants in Manhattan when restaurants were ordered to close in-person dining due to the current COVID-19 pandemic. He was laid off at that time and has been searching for a job ever since. (As the Court can imagine, finding restaurant jobs during this time has been challenging.) He has just been offered a job as a busboy/assistant server at the Kouzina Greek Taverna & Barn in Stamford, and they would like him to start tomorrow (Saturday, September 12, 2020) if possible.

SO ORDERED.

We have spoken to pretrial services, and they have no objection to the Court modifying Mr. Paulino's bail conditions so that he can travel to and from work in Stamford, Connecticut. They also noted that Mr. Paulino has been completely compliant with pretrial services since his arrest. We have also spoken to AUSA Peter Davis and the Government has no objection to this request.

Respectfully,
Sarah

SO ORDERED, 9/11/2020
ALISON J. NATHAN, U.S.D.J.